

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

PETER POE, et al.,

Plaintiffs,

v.

GENTNER DRUMMOND, et al.,

Defendants.

Case No. 23-CV-177-JFH-SH

PROTECTIVE ORDER

On July 17, 2023, the Court granted Plaintiffs' motion for leave to proceed under pseudonyms and for a protective order and directed the parties to confer in an attempt to agree upon the terms of a protective order. Dkt. No. 124 at 9-10. The Court directed that the protective order be tailored to maintain absolute confidentiality of any identity information that is ultimately disclosed and to strictly limit the number of persons who are privy to that information. The Parties jointly request entry of this Protective Order in accordance with and to effectuate the Court's ruling.

Based on the Court's July 17, 2023 Order and the Parties' agreement, IT IS HEREBY ORDERED that:

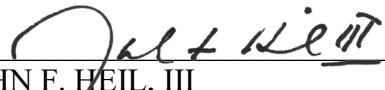
1. Plaintiffs may proceed in this action under the pseudonyms "Peter Poe," "Paula Poe," "Patrick Poe," "Daphne Doe," "Donna Doe," "Brandon Boe," "Bethany Boe," "Benjamin Boe," "Lydia Loe," "Lauren Loe," "Ryan Roe," "Rachel Roe," and "Richard Roe" ("Pseudonym Plaintiffs");
2. In all publicly filed documents, the Pseudonym Plaintiffs shall be identified only by their pseudonyms;

3. All documents filed with this Court that contain the present or former name of one or more Pseudonym Plaintiffs or contain information that identify one or more of them, directly or indirectly, shall be redacted;
4. Within seven (7) days of the entry of this Order, Pseudonym Plaintiffs shall file a notice under seal disclosing their legal names to the Court and to Defendants' Counsel of Record in this matter;
5. Defendants' Counsel of Record shall not disclose Pseudonym Plaintiffs' identities to any person, except: (a) to their employees, but only to the minimum extent necessary to litigate this action; or (b) as otherwise explicitly authorized by any protective order entered in this action concerning discovery procedures and protection of confidential information;
6. Defendants' Counsel of Record shall ensure that persons to whom disclosure is made under paragraphs 4 and 5 have read and agree to be bound by this Order and shall provide the names of those persons to Plaintiffs' counsel upon request;
7. Under no other circumstances shall any individual to whom disclosure of Pseudonym Plaintiffs' identities is made further disclose Pseudonym Plaintiffs' identities, either directly or indirectly, without the written consent of Plaintiffs' counsel;
8. The parties shall meet and confer about discovery procedures and protection of confidential information, including information pertaining to Plaintiffs and their families, including, but not limited to, personal identifying information, financial information, medical information, demographic information, the identities of persons associated with Plaintiffs or their physicians who have not already been

made public in this action, and any other information that may jeopardize safety or privacy.

9. No person shall disclose identifying information to the media for any reason;
10. No person shall disclose identifying information for any reason in any courtroom proceeding, and the parties shall work collaboratively to ensure that any exhibit providing identifying information presented in any courtroom proceeding is protected from public view;
11. In the event of any disclosure of identifying information in any courtroom proceeding, the court shall instruct members of the public attending the proceeding not to disclose any identifying information. In such event, all media members in attendance will be required to provide their names to ensure no identifying information is used in any media reports; and
12. If any specific issues related to nondisclosure of the identities of Pseudonym Plaintiffs arise during the course of this action, the parties shall seek to resolve those issues without court intervention. If the parties cannot agree, they shall seek further clarification from this Court.

Dated this 15th day of August 2023.



JOHN F. HEIL, III
UNITED STATES DISTRICT JUDGE